

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>CHECKPOINT SYSTEMS, INC,</b>	)	CASE NO. 5:11-cv-01199-SL
	)	
<b>Plaintiff,</b>	)	JUDGE SARA LIOI
	)	
<b>v.</b>	)	MAG. JUDGE GEORGE J. LIMBERT
	)	
<b>HANGZHOU CENTURY CO., LTD, <i>et</i> <i>al.</i>,</b>	)	<b>UNIVERSAL SURVEILLANCE</b>
	)	<b>CORPORATION'S REPLY TO</b>
	)	<b>COUNTERCLAIMS OF PLAINTIFF</b>
<b>Defendants.</b>	)	<b>(DEMAND FOR JURY TRIAL)</b>

For its reply to the Counterclaims of Plaintiff Checkpoint Systems, Inc., ("Checkpoint")`  
Defendant/Counterclaim Plaintiff Universal Surveillance Corporation ("USS") hereby states and  
avers as follows:

**FIRST DEFENSE**

1. The Counterclaims fail to state a claim upon which relief can be granted.
2. USS admits the averments contained in paragraphs 1, 2, 3, 4, 5, 6, 7 and 8 of the Counterclaims.
3. USS denies the averments in paragraphs 9, 10 and 11 of the Counterclaims.
4. As to paragraph 12 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-11 of the Counterclaims.
5. USS admits the averments in paragraph 13 of the Counterclaims.
6. USS denies the averments in paragraph 14 of the Counterclaims.
7. As to paragraph 15 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-14 of the Counterclaims.
8. USS admits the averments of paragraph 16 of the Counterclaims.

9. USS denies the averments of paragraphs 17, 18 and 19 of the Counterclaims.

10. As to paragraph 20 of the Counterclaims, USS repeats and realleges its averments with respect to paragraphs 1-19 of the Counterclaims.

11. USS admits the averments of paragraph 21 of the Counterclaims.

12. USS denies the averments of paragraph 22 of the Counterclaims.

**PRAYER FOR RELIEF**

WHEREFORE, USS requests the following relief:

a) Dismissing Checkpoint's Counterclaims, with prejudice, and denying any claim for relief prayed for therein;

b) Judgment that Checkpoint infringes, directly or indirectly, U.S. Patent Nos. 7,969,310 ("the '310 patent") and U.S. Patent No. 7,342,495 ("the '495 patent");

c) Judgment that claims of the '310 and '495 patents are not invalid;

d) An award of damages to USS to compensate for Checkpoint's infringement of the '310 and '495 patents;

e) A permanent injunction enjoining Checkpoint from continuing to infringe the '310 and '495 patents;

f) Judgment that this is an exceptional case and an award of attorneys' fees and costs to USS pursuant to 35 U.S.C. § 285; and

g) Such other relief as the Court deems appropriate.

Respectfully submitted,

*/s/ Kip T. Bollin*

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Kip T. Bollin (0065275)

*kip.bollin@thompsonhine.com*

Holly H. Little (0084054)

*holly.little@thompsonhine.com*

THOMPSON HINE LLP

3900 Key Center

127 Public Square

Cleveland, OH 44114-1291

Phone: (216) 566-5500

Fax: (216) 566-5800

*Counsel for Defendant Universal Surveillance  
Corporation*

Douglas Carsten

*dcarsten@wsgr.com*

WILSON SONSINI GOODRICH & ROSATI

12235 El Camino Real, Suite 200

San Diego, CA 92130

Phone: (858) 350-2300

Fax: (858) 350-2399

Matthew A. Argenti

*margenti@wsgr.com*

Albert Shih

*ashih@wsgr.com*

WILSON SONSINI GOODRICH & ROSATI

650 Page Mill Road

Palo Alto, CA 94304

Phone: (650) 493-9300

Fax: (650) 493-6811

*Counsel for Defendant Universal Surveillance  
Corporation*

Larry L. Shatzer

*lshatzer@wsgr.com*

Shaun R. Snader

*ssnader@wsgr.com*

WILSON SONSINI GOODRICH & ROSATI

1700 K Street, N.W., Fifth Floor

Washington, DC 20006

Phone: (202) 973-8800

Fax: (202) 973-8899

*Counsel for Defendant Universal Surveillance  
Corporation*

**JURY DEMAND**

USS demands a trial by jury on all issues so triable.

*/s/ Kip T. Bollin*

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Kip T. Bollin (0065275)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was filed on September 21, 2012 via the Court's electronic filing system. Parties may access the filing through the Court's electronically.

*/s/ Kip T. Bollin*

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One of the attorneys for Defendant Universal  
Surveillance Corporation